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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

RESIDENTIAL CAPITAL, LLC, *et al.*,

Debtors.

Chapter 11

Case No. 12-12020 (MG)

Jointly Administered

**NOTICE OF INTENT TO PARTICIPATE IN DISCOVERY RELATED TO PLAN
CONFIRMATION**

NOTICE IS HEREBY GIVEN that the plaintiffs in the putative class action captioned *Rothstein, et al. v. GMAC Mortgage, LLC, et al.*, No. 1:12-CV-3412-AJN (S.D.N.Y) (“*Rothstein*”), represented by the undersigned counsel, have filed Claim(s) Number(s) 3966 and 4074 against Residential Capital LLC and GMAC Mortgage LLC, respectively, each in the amount of \$1,000,000,000 and are parties of interest in the confirmation of a plan in the above-captioned chapter 11 cases (the “Chapter 11 Cases”) on the bases of, *inter alia*, objections to the unauthorized and unjustified third-party releases contained in the plan.

ACCORDINGLY, PLEASE TAKE FURTHER NOTICE that, subject to any objections by the Debtors or the Statutory Committee of Unsecured Creditors appointed in the Chapter 11 Cases and/or any limitations imposed by the Court, the above-named party-in-interest and its counsel intends to participate in Plan Discovery as defined in the Order Establishing Procedures

in Connection with Discovery Related to Plan Confirmation and Other Issues entered by the Court on September 9, 2013 [Docket No. 4974].

Contact Information for Party-in-Interest (address, phone and email):

Rothstein Plaintiffs
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N/A

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Dated: September 16, 2013

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-and-

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